

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Case No. 19-10677-MKV

Krailes Debrist Flores,

Chapter 7

Debtor.

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**NOTICE OF REPLY TO DEBTOR'S OPPOSITION TO
MOTION TO CONFIRM ABSENCE OF THE AUTOMATIC STAY**

PLEASE TAKE NOTICE, that upon the Motion dated March 28, 2019 (the "Motion"), of Fay Servicing LLC as servicer for U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust (the "Movant"), a secured creditor of the above-named Debtor, by its attorneys, Friedman Vartolo LLP., shall move before the Honorable Mary Kay Vyskocil, United States Bankruptcy Judge, One Bowling Green, New York, NY 10004-1408, on May 29, 2019 at 10:00 a.m., seeking an Order: (i) pursuant to 11 U.S.C. § 362(c)(4)(A)(i) and (ii) confirming that the automatic stay imposed by 11 U.S.C. § 362(a) did not take effect upon the filing of the instant petition as the debtor had two previous cases pending within the previous year which were dismissed and (ii) granting such other and further relief as this Court deems is just and proper.

Dated: May 20, 2019
New York New York

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TO:

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